

TIFFANY & BOSCO
P.A.

SEVENTH FLOOR CAMELBACK ESPLANADE II
2525 EAST CAMELBACK ROAD
PHOENIX, ARIZONA 85016
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State Bar No. 010167
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State Bar No. 014228
Attorneys for Movant
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13-08726

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF ARIZONA**

IN RE:

John McLoughlin

Debtor.

HSBC Bank USA National Association, as
Trustee (The "Trustee") for the holders of
Deutsche Alt-A Securities, Inc. Mortgage Loan
Trust, Series 2007-RAMP1

Movant,

vs.

John McLoughlin, Debtor; Russell Brown,
Trustee.

Respondents.

No. 2:13-bk-14029-DPC

Chapter 13

**NOTICE OF FILING MOTION FOR
RELIEF FROM THE AUTOMATIC STAY
AND
REQUIREMENT TO FILE**

RE: Real Property Located at
2552 East Magnolia Drive
Gilbert, AZ 85297

NOTICE IS HEREBY GIVEN that the above Movant has filed a motion requesting relief from the automatic stay, the details of which are as follows:

Movant asserts that there is no equity in the property, which is the subject of the Motion for Relief from Stay, and/or Respondent has not provided Movant with adequate protection with respect to such property. Therefore, Movant is entitled to an Order Lifting Stay with respect to such property.

1 FURTHER NOTICE IS HEREBY GIVEN that pursuant to Local Bankruptcy Rule 4001
2 if no objection is filed with the court and a copy served on Movant whose address is:

3 HSBC Bank USA National Association, as Trustee (The "Trustee") for the
4 holders of Deutsche Alt-A Securities, Inc. Mortgage Loan Trust, Series 2007-
5 RAMP1
6 c/o Leonard J. McDonald, Esq.
7 Seventh Floor Camelback Esplanade II
8 2525 East Camelback Road
9 Phoenix, Arizona 85016

10 WITHIN 14 DAYS of service of the motion, the motion for relief from the automatic stay may
11 be granted without further hearing.

12 FINALLY, Movant's Counsel certifies that a letter was sent seeking to resolve the issues
13 necessitating the motion, to Debtor's Counsel or the Debtor if the Debtor is without counsel and
14 that after sincere effort the parties have been unable to resolve the matter, and the letter was sent
15 at least seven (7) days prior to the filing of the motion.

16 DATED this 2nd day of February, 2018.

17 TIFFANY & BOSCO, P.A.

18 BY /s/ LJM #014228

19 Mark S. Bosco
20 Leonard J. McDonald
21 Attorney for Movant

22 Copy of the foregoing was
23 mailed February 2, 2018.

24 John McLoughlin
25 7235 E. Hampton
26 # 106
Mesa, AZ 85209
Debtor

Shane D. Buntrock
Buntrock & Gardner Law, PLLC
2158 N. Gilbert Rd., #119
Mesa, AZ 85203
Attorney for Debtor

1 Russell Brown
2 Chapter 13 Trustee
3 Suite 800
4 3838 North Central Avenue
5 Phoenix, AZ 85012-1965
6 Trustee

7 Elizabeth C. Amorosi
8 Office of the U.S. Trustee
9 230 N. 1st Avenue, Suite 204
10 Phoenix, AZ 85003
11 Attorney for U.S. Trustee

12 By: Julie Bush
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